

**From:** Lindsey Weiss Harris  
**Sent:** Monday, November 30, 2015 12:57 PM  
**To:** 'Cymrot, Mark'  
**Cc:** Michael S. Kim  
**Subject:** RE: Notice of Deposition of William F. Browder

Mark,

Unfortunately, December 3 is not an option. We were unaware of your daughter's wedding, as we were not at that conference. We are doing our best to be as accommodating as possible given the many personal and professional commitments we also have during the holiday season. November 27 has passed because you did not wish to do it on that date. We moved some things around so that we can also be available on December 7. If that doesn't work for you, it will have to be December 30, January 4 or January 5. Mr. Browder can appear via videoconference on those dates from our London office.

Please let us know which date you prefer so that we can get this in the calendar.

Best,

Lindsey Weiss Harris  
+1 212 488 4937

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**From:** Cymrot, Mark [<mailto:MCymrot@bakerlaw.com>]  
**Sent:** Tuesday, November 24, 2015 4:11 PM  
**To:** Lindsey Weiss Harris  
**Cc:** Michael S. Kim  
**Subject:** Notice of Deposition of William F. Browder

Lindsey: We attempted to accommodate Mr. Browder's schedule when you told us he would not appear at the noticed deposition on November 23, 2015. That deposition was noticed pursuant to the Court order of November, 6 2015. However, when we asked you for dates Mr. Browder would be available, you gave us unreasonable dates: November 27 (the day after Thanksgiving), December 30 (the day after my daughter's wedding, a fact that I announced in court during the discussion of trial date), and January 4 (two days before trial). We, therefore, have noticed the deposition of December 3, 2015. A deposition notice is attached. We look forward to seeing Mr. Browder on that date.

Regards

Mark Cymrot

**Mark A. Cymrot** | **BakerHostetler**

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